



**Sustainable**  
Development Commission

**NEWP Discussion Document**

# **An Invitation to Shape the Nature of England**

**SDC Consultation Response**



# **NEWP Discussion Document – “An Invitation to Shape the Nature of England”**

## **SDC Consultation Response**

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## 1 Introduction

The Sustainable Development Commission (SDC) welcomes the intention to publish the Natural Environment White Paper (NEWP) as long as it leads to an improvement in the conditions and value attached to the natural environment of England and beyond. However, at this stage in the NEWP's drafting we would expect to see a greater indication of its final content.

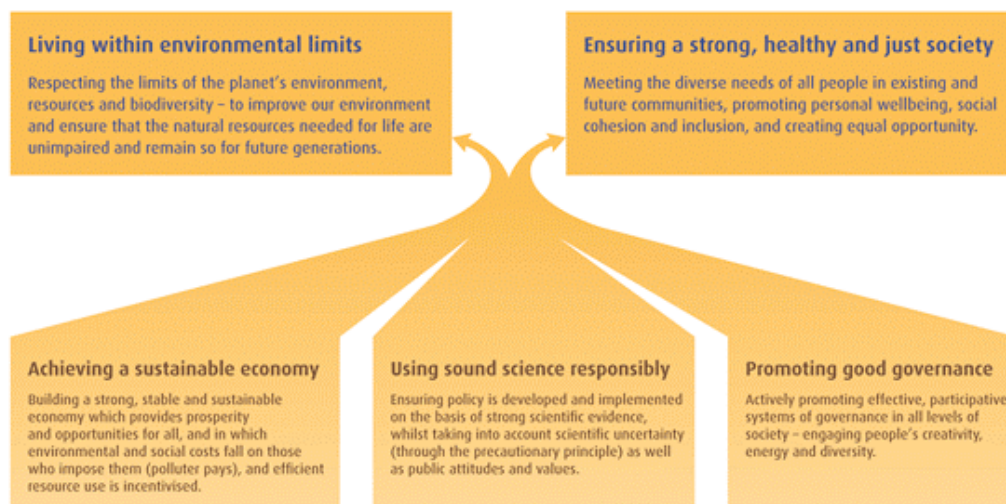
In responding to Defra's discussion document, *An Invitation to Shape the Nature of England* the SDC seeks to highlight the key challenges which we believe the NEWP should address, and to begin a discussion on these issues. We have not addressed in detail the vitally important issues surrounding the ecological footprint of the UK economy on the rest of the world as these were addressed in considerable depth in the SDC report *Prosperity without Growth*.<sup>1</sup>

The SDC has undertaken a number of pieces of work in relation to the natural environment and its fundamentally beneficial relationship with the health and wellbeing of citizens. The findings of these reports are referred to in the three Annexes. We have also provided evidence to the Communities and Local Government Select Committee Inquiry into Localism. The SDC believes there are three key elements to enabling and encouraging local government and their partners to work together to deliver better outcomes for the environment and sustainable development: a shared vision; mechanisms to enable delivery; and monitoring and accountability.

Further work is being undertaken on Environmental Limits and on the implications for National Infrastructure and these will be completed in early spring.

## 2 Key Concepts

The five principles of sustainable development, agreed by the previous Government in 2005, should provide the overall context for policy on the natural environment, since its drivers are creating a strong, just and healthy society whilst living within environmental limits.



*The principles of sustainable development Source: Securing the Future, HMG, 2005]*

<sup>1</sup> SDC 2009. Prosperity Without Growth? [http://www.sdc-commission.org.uk/publications/downloads/prosperity\\_without\\_growth\\_report.pdf](http://www.sdc-commission.org.uk/publications/downloads/prosperity_without_growth_report.pdf)

Economics must be driven by science, not the reverse. Whilst mechanisms such as the valuation of ecosystem services, or the internalisation of external costs, are appropriate parts of the policy framework, their robustness is wholly dependent on the quality of the underpinning science. This principle has been firmly established in climate change policy, and should be more widely adopted.

We strongly support the recommendations of the Lawton review *Making Space for Nature*,<sup>2</sup> and its overall objective of a coherent and resilient ecological network (more, bigger, better, joined). This outcome is a precondition for future sustainability: it cannot be traded off against social and economic objectives but must be delivered alongside them.

In developing future policy on the natural environment, we therefore suggest that the Government should use the “**State-Pressure- Response**” model:

- The forthcoming *National Ecosystem Assessment*,<sup>3</sup> building on the work and concepts of the *Millennium Ecosystem Assessment*,<sup>4</sup> should provide an appropriate basis of evidence for the **state** stage
- A clear and regularly updated analysis of the current and future **pressures** upon this system and how best to mitigate them, or transform them into benefits. Defra should utilise and follow the recommendations produced by the Foresight Land Use Futures project<sup>5</sup>
- A comprehensive set of policy **responses** based on the above, deploying the range of levers available (including, for example, regulation, fiscal measures and price signals, spatial planning, Green Book guidance etc.)

Good practice exists in all three areas, but this way of framing the issues may help to direct attention and address the significant gaps and opportunities that currently exist. In *An Invitation to Shape the Nature of England* Defra identifies three overarching challenges for the NEWP to consider: climate change; demographic changes; and incremental impacts. The SDC does not disagree that these are serious issues for concern. However, in the context of the model above, these are all **pressures**, and significant challenges remain for Government in the effective measurement of the **state** of the natural environment, which the SDC believes the NEWP should also be addressing as priorities.

The rest of this report identifies the three key challenges which the SDC believes must be addressed by the NEWP - environmental limits, biodiversity loss and the concept of valuing ; along with one critical issue on the **response** side - the future of spatial planning.

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<sup>2</sup> Lawton, J.H. et al, (2010) Making Space for Nature: a review of England’s wildlife sites and ecological network.

<sup>3</sup> <http://uknea.unep-wcmc.org/>

<sup>4</sup> MA 2005. Millennium Ecosystem Assessment

<sup>5</sup> Foresight Land Use Futures Project (2010) Final Project Report. The Government Office for Science, London

### 3 Establishing Environmental Limits

The five principles of sustainable development introduce the concept and importance of environmental limits. The SDC suggests a working definition of an environmental limit as:

*The critical point(s) at which pressure on a natural resource or system creates unacceptable or irreversible change to the resource or system itself, and to the detriment of the [humans and] organisms to which it provides a service.*

In relation to carbon emissions, the principle of environmental limits is now powerfully established in law and policy in the form of the Climate Change Act, carbon budgets, the 10:10 commitment and more. This robust and world-leading approach needs to be extended as a matter of urgency to other environmental limits.

*An Invitation to Shape the Nature of England* highlights the range of ‘values’ provided to society by the natural environment and ecosystem services. The SDC agrees that the full range must be appreciated and conserved, and also, in order to build resilience into the system, enhanced. Monetary- and non-monetary valuation may play a part in this, but this approach to policy cannot of itself ever keep us from breaching our environmental limits. The NEWP must strongly endorse the concept of environmental limits, and set out how the Government intends to recognise and embed these limits, both nationally and locally as they change over time, in order for them to be taken into account when planning new infrastructure or services.

The range of parameters for which limits should be set should include, at minimum, the following:

- Levels of carbon dioxide and other greenhouse gases - moving beyond atmospheric concentrations to measure and set limits in relation to carbon flows to and from soils, vegetation and the marine ecosystem
- Biodiversity and habitat quality, quantity and connectivity - this is essential to avoid both species loss and meet EU and international targets, as well as to maintain crucial ecosystem services provided by high quality, well-connected habitats. It will require further work to define favourable conservation status and coherent networks, as highlighted in our Equal Value Investigation and in the Lawton Review
- Air quality - to meet EU limit values and reduce illness and deaths due to respiratory illness
- The quantity, quality, distribution and ecological status of freshwater resources and the status of groundwater (an issue of concern in the Defra report on SD indicators)
- The status of soils and the rate of depletion/degradation - in order to sustain the productivity of land, prevent the polluting effects of erosion and run-off, and sustain crucial carbon sequestration benefits
- Background concentrations of bioaccumulative, persistent and mobile synthetic chemicals in our air, water and soil

- Land use allocation - to ensure that the multifunctionality of land is supported. This should include the provision of space for biodiversity, carbon sequestration, economic development, food production, green space and recreation, housing and infrastructure, and transportation. It should also consider the conversion of land from ecologically reversible use (such as organic farming) to relatively irreversible use (such as urban development).

More effort is needed from Defra to develop clear environmental limits at national and local scales, in order that these can be better applied across all planning, development, investment (e.g. through the Green Book and similar analyses), and wider policy decisions. Recognising these limits can and should draw on Defra's work on the *National Ecosystem Assessment*.

We would encourage Defra to reassess its previous work on environmental limits and initiate an open and constructive dialogue with key stakeholders to discuss how to set environmental limits at differing spatial scales in a way which is scientifically robust and has practical utility for decision makers. This dialogue needs to bring together expertise from individuals within academia, NGOs, agencies, wildlife trusts and local organisations, building on the good practice for stakeholder engagement identified in the SDC's Equal Value Investigation.

Ecosystem services may, and often will, deliver benefits far wider than the immediate locality of the resource, and such indirect effects must always be considered when observing and setting limits. Valuing, respecting and conserving the natural environment in England, and recognising our environmental limits, is only worthwhile if we acknowledge that our natural environment comprises components which connect with many other systems beyond England. This requires Government to consider components which vary widely in terms of the spatial scale at which they operate: from global carbon dioxide concentrations and the water cycle, to European networks such as Natura 2000, to English regional water resources, down to the conservation status of certain threatened plant species.

At every spatial and temporal scale our natural environment provides services beyond those which we see and feel directly or can currently measure; services which are essential to our quality of life, now and for future generations. Setting, and operating within, environmental limits will help us to position ourselves in order to maintain quality of life, as well as to create job opportunities and sustain wealth creation in the future, particularly in the context of economic shocks, globalisation and climate change. It will help us to function within existing and anticipated legislative limits, and to draw on the expertise and opportunities available to the private sector in safeguarding and enhancing the natural environment and ecosystem services.

#### **4 Halting and Reversing Biodiversity Loss and Restoring Ecosystem Functions and Services**

Biodiversity, and the ecosystem functions and services which flow from it, support the production of our food, the quality of our air and water, our enjoyment of the natural landscape, and can mitigate and protect us from the effects of climate change.

The recent failure to meet the international target of halting biodiversity loss by 2010<sup>6</sup> poses a challenge and an opportunity to address these issues at the local level, with communities leading the charge. Now that the Government has signed up to revised targets to stem biodiversity loss, set in COP10 at Nagoya, the SDC would expect the NEWP to set a clear, long-term plan on how Defra intends to work across Government and the public and private sectors to achieve these aims. This work needs to begin now and addressing biodiversity loss must be a key focus for Defra activity.

The ability to protect and enhance biodiversity and the range of ecosystem services can be greatly improved by changes in our land management practices and a stronger base of evidence will be an essential prerequisite for policy development. However, the absence of such evidence should not be used as an excuse to disregard potential ecological consequences and where there is uncertainty then the 'precautionary principle' should apply.

Attempts were made by, the then, English Nature to define and distinguish between "Critical Natural capital" and "Constant Natural assets". This thinking was based on the idea that some elements of biodiversity, for example ancient woodland (and therefore the functions and services they provide), are essentially irreplaceable within human timescales and resources. By contrast, other elements – for example some types of freshwater ecosystem - are based on highly mobile species which colonise rapidly, and are relatively easy to re-create. The SDC opened up some dialogue on these complex and highly contested issues as part of its *Equal Value Investigation* in relation to Severn Tidal Power and the Habitats Directive. Aside from the controversy over the specific proposal, this dialogue demonstrated that we do not yet know enough about how to define important concepts which are at the heart of the EU Directives on Habitats and Birds, notably those of Favourable Conservation Status and the creation of coherent networks of protected areas. This issue also appears in the Lawton review.

Without greater clarity, scientific consensus and wide and effective stakeholder engagement on how to reconcile biodiversity requirements with competing challenges for land use there is a serious risk that debate will be polarised into irreconcilable camps. On one side are those for whom it is convenient to argue that loss of biodiversity in one area can easily be replaced in another, and on the other side are those who want to cling to preservation of the status quo of conservation sites at all costs. The resultant gridlock could stifle innovative and creative attempts at landscape scale restoration of functioning ecosystems and the ability to build in greater ecological and social resilience to climate change impacts. The SDC considers that valuing and taking stock of 'natural assets' is a positive approach to recognising and appreciating the importance of the natural environment & ecosystem services. However, there is considerably controversy as to whether some nature stocks are tradeable and this further debate and resolution. If Defra is to increase its focus on these issues, building on the work of TEEB and others, it must exercise the precautionary principle and provide guidance to ensure that critical environmental assets will not be left open to market failures.

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<sup>6</sup> 2002 Convention of Biological Diversity



## **5 Embedding Environmental Limits In Spatial Planning**

Our final point is in relation to the response side of the ‘pressure- state- response’ model, the role of spatial planning. We have highlighted this particular area as it is the subject of enormous change at the current time, and therefore has the potential to present either a threat or an opportunity.

The purpose of planning, as re-iterated by this Government, is sustainable development, and the planning system has a particularly critical impact on our ability to deliver a sustainable future. When based on sustainable development principles planning will help to deliver infrastructure provision, local devolution, promote well being in a fair and equitable way, and protect and enhance the natural environment. A genuinely sustainable planning system is one that should promote the highest quality development and most beneficial use of land, in the most appropriate locations at the most appropriate time, and in the public interest.

Land use decisions should ensure that natural systems, resources and the diversity upon which people depend are maintained and wherever and whenever possible enhanced for both our immediate benefit and for that of future generations. At the same time they must ensure that sufficient suitable land is available at the right time and in the right places to support economic prosperity and innovation, economic viability, attractive localities and a wide range of jobs that meet the needs of current and future generations.

The introduction of National Policy Statements was an acknowledgment for the need for a national strategic approach to infrastructure projects but without the essential consistent spatial approach. Biodiversity and ecosystem functioning is always spatially correlated – you cannot have a coastal ecosystem at the top of a mountain. Yet this lack of a spatial dimension is further exacerbated by the absence of a national spatial plan for England that provides a framework for decision making. Without this mechanism for allocating limited land availability effectively, policy makers will be unable to assess the cumulative impacts of their decisions upon the natural environment, resulting in unbalanced and unsustainable development.

The introduction of Local Enterprise Partnerships (LEPs) brings the risk of an overly narrow, economically-focused approach to planning. The variety of spatial scales being proposed for LEPs also makes it difficult to see how potential conflicts will be managed across administrative boundaries. Problems may arise if, for example, there is a proposal for a cross-boundary development, such as a trunk road, for which a LEP or multiple LEPs are in favour because it will create more jobs, but that goes against the objectives of a local plan because it will damage an environmental asset or increase social inequity. These types of issues were formerly addressed at the regional level, which meant that sustainable development had to be the basis for the decision making process. We understand that CLG will not be issuing guidance to local planners to resolve these types of conflicts, so how will these issues be resolved and how will the Government ensure that the natural environment, within the context of a sustainable development approach, is considered?

The SDC has previously noted that Defra have committed to “Revise guidance on Impact Assessments, the Green Book and other policy appraisal guidance to take account of sustainability

and the value of nature” in their Structural Reform Plan. But as yet, Defra have not taken any solid steps in advancing this work.<sup>7</sup>

## **6 Conclusion**

The SDC considers that the intention to publish the NEWP provides an important opportunity to build on work to assess the state, and record the status and effects of pressures upon, the natural environment in England and beyond. The NEWP should then form the framework from which to deliver viable policy and regulatory responses from all Government departments in order to ensure that the critical services provided by the natural environment are sustained alongside economic and social well being for current and future generations.

In order to deliver this, the SDC challenges Defra to address the key challenges of constructively identifying environmental limits; actively leading the Government’s actions to halt and reverse biodiversity loss and restore ecosystem services (and within that paying due attention to the concept of valuing natural capital whilst applying the precautionary principle); and responding to these challenges by working across Government to follow a national spatial planning approach and consider the cumulative impacts for all land use decisions.

By taking on the challenges of ‘mainstreaming sustainable development across government’ and publishing the NEWP, Defra has the opportunity to work collaboratively across government and provide the basis for local governance, communities and businesses to embed an approach to conserving the natural environment which can deliver multiple priorities and benefits, including making significant financial savings. The annexes to this report provide examples of where and how these objectives can be achieved, and we urge Defra to investigate and work openly to achieve them.

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<sup>7</sup> SDC (2010) Embedding Sustainable Development across Government: Environmental Audit Committee Inquiry

### **Education, Training And Opportunities For Young People**

The natural environment plays a key role in influencing outcomes for young people. It can influence young people's development through the quality of place in which they live, whilst also providing opportunities for activities, approaches and learning that can engage and support even the most disaffected young people, enabling them to overcome barriers to participation.

The SDC's report *Improving Young People's Lives* (2010)<sup>8</sup> proposes a green thread through policy and practice, where the impact of the environment is considered alongside social and economic factors – the building blocks of sustainable development. To date, this has been the missing element in most policy making for young people, and is only sporadically evident in local delivery. We demonstrate how taking this broader approach can improve outcomes for young people, whilst supporting the Government's aims for a Big Society and being the 'greenest Government ever'.

The report highlights three areas in which positive approaches to the natural environment and young people can yield benefits for both, and society at large. Defra should work closely with the Department for Education to realise the co-benefits of delivery.

### **Jobs And Employability**

The environment should be used to help young people into long-term employment through programmes that build their social and personal skills, whilst providing accreditation and opening up potential career options.

### **Resilience, Health And Behaviour**

Support should be provided to young people to increase their physical activity through low-cost programmes to promote walking and cycling, and regular exercise in green places, both within and outside of school, through the greater use of outdoor spaces.

Structured outdoor learning or environmental therapeutic programmes such as Forest Schools should be set up to support the engagement and rehabilitation of disaffected young people, particularly through early intervention programmes or alternative provision.

In the same way that a tree-planting initiative has been established for the NHS (the 'NHS Forest'), a similar scheme could be set up for schools in England ('School Forest') in which primary school leavers would be responsible for planting trees in their school and local area as a legacy for younger children. This would involve approximately 1m trees being planted each year, complementing school gardens and local greenspace and woodland projects, proving an effective way of engaging young children with the natural environment, while also contributing to Defra's tree-planting campaign. There should be increased investment generally in the creation of quality green spaces, especially in deprived areas, including tree planting programmes for residential streets.

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<sup>8</sup> SDC 2010. *Improving Young People's Lives: The role of the environment in building resilience, responsibility and employment chances*. [http://www.sd-commission.org.uk/publications/downloads/SDC\\_IYPL\\_report.pdf](http://www.sd-commission.org.uk/publications/downloads/SDC_IYPL_report.pdf)

## **Personal Responsibility**

Young people should be supported and enabled to lead community-based projects to take action on local issues they care about. These provide opportunities for young people to develop personal responsibility and could support implementation of the National Citizen Service and the Government's ambitions for the Big Society.

Provided such support, young people will be prepared for the emerging green economy with the right skills and academic or vocational qualifications to take advantage of the new 'green' job opportunities that will become available across a range of sectors, and have differing levels of entry to employment. Structured opportunities that could potentially provide stepping stones to employment can be developed within environmental and community organisations, and young people can be encouraged to connect with and shape the places where they live, and the natural environment at large.

## Health and Inequalities

The natural environment is key to the flourishing of communities. Green spaces, or open, undeveloped land with natural vegetation, have been shown to have physical and mental health benefits. Most fundamentally, they may help to reduce long-term stress, a major determinant of health inequalities. Promoting more equitable access to green spaces is a preventative and synergistic approach with economic, environmental, social and health benefits. In *Health, Place and Nature* (2008)<sup>9</sup> the SDC highlights the links between health and green and open spaces.

By improving the care for and accessibility of the natural environment, Defra can help to tackle health inequalities and deliver a more sustainable health system. A health system based on prevention would support a long term reduction in health inequalities, building on and strengthening the social model of health and delivering environmental benefits. In order to achieve this, the concept of preventative and public health must be expanded beyond the current narrow definition of ill health prevention by the NHS. The research throughout the SDC's report *Sustainable Development: The key to tackling health inequalities* (2010)<sup>10</sup> overwhelmingly demonstrates that for a sustainable, preventative approach to health inequalities to take root, ownership for health issues must be spread beyond health professionals and indeed, at times, beyond the public sector. Rather than an additional burden, such an approach is a successful way of making budgets work harder and achieving wide-ranging improvements in health, environmental and economic terms. By 'mainstreaming sustainable development across Government', Defra can help drive these efficiencies and cost savings, and achieve a healthier population and natural environment.

Defra should work with wider Government departments, the NHS, social care, local authorities, schools, and the private sector (through a range of different sectors and services including education, employment, planning, housing, benefits, and transport) to recognise the extensive benefits of contact with the natural environment. Spatial Planning for Health Guidance being developed by NICE and aimed at local authorities and PCTs exemplifies the approach needed, recognising the impact spatial planning could have by addressing the wider determinants of health. Encouragingly, such smart partnership working has already begun to happen in cities such as Bristol.

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<sup>9</sup> SDC 2008. *Health, Place and Nature*. [http://www.sd-commission.org.uk/publications/downloads/Outdoor\\_environments\\_and\\_health.pdf](http://www.sd-commission.org.uk/publications/downloads/Outdoor_environments_and_health.pdf)

<sup>10</sup> SDC 2010. *Sustainable Development: The key to tackling health inequalities*. [http://www.sd-commission.org.uk/publications/downloads/health\\_inequalities.pdf](http://www.sd-commission.org.uk/publications/downloads/health_inequalities.pdf)

## Land Use Issues

### Multifunctionality of Land

As reported in the Government-funded Foresight Land Use Futures<sup>11</sup> report:

“...the ability of given parcels of land or landscapes to deliver multiple benefits simultaneously – so called ‘multifunctionality’ – adds to its value and versatility. However, many land uses can conflict with each other, more land for one use can mean less for another. Whilst it is important to consider the impact of change within individual land use sectors such as conservation, agriculture and housing separately, the evidence in this report makes clear that progress on the most important challenges ahead will only be made by:

- Identifying how the various demands on land made by different sectors will interact, and evaluating the consequences of those interactions; and
- Taking a broad and overarching perspective across sectors and different levels of governance.

Government has already made progress in both areas, but a key conclusion of this Report is that there is a strong case to do more. Achieving a more coherent and consistent approach to guiding land use and management so that more sustainable and valued outcomes are delivered is a recurrent theme throughout this report.”

### Landscape Scale Approach

The UK has international, European and national obligations to protect and enhance biodiversity and to date has failed to achieve the targets it has been set. There are a variety of reasons for this one of which is the piecemeal approach currently taken on nature conservation which has not been sufficient to protect our natural world from the ever-increasing demands on land.

A number of organisations, such as Natural England and the RSPB, have already done considerable work on ‘landscape-scale conservation’, focusing on the need to safeguard eco-systems and ecological networks. Such work aims to protect and enhance the essential services these systems provide and also help build their resilience to climate change impacts which will become more crucial over time.

Looking at the connectivity between habitats is also an effective way to assess the efficient use of public money in supporting these networks. For example, Environmental Stewardship payments are made on a farm by farm basis and applied according to the uses the individual land manager wishes to focus upon. However, if it was applied with a more landscape scale approach, looking at the connectivity of habitats across farms it could bring greater ecological benefit for the same economic spend.

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<sup>11</sup> Foresight Land Use Futures Project (2010) Final Project Report. The Government Office for Science, London

## Sustainable Diets

The way we produce our food has direct impacts on our natural environment, and climate change will increasingly affect food yield, nutritional quality, food safety and affordability. A sustainable food system can bring multiple benefits to health, prosperity, the natural environment, and resilience to climate change. Government food policies and corporate practices must encourage and enable healthy, affordable and sustainable food choices, both through public procurement and fiscal and other policy mechanisms. In its Food 2030 strategy, Defra set out Government's vision for a sustainable and secure food system, identifying as a key priority encouraging and enabling people to eat a healthy, sustainable diet.

A significant challenge will be achieving an acceptable balance between producing, and where appropriate, importing sustainable food for a growing population, and meeting the increasing calls for agricultural policy/subsidies to incentivise and reward environmental stewardship. In order to achieve this, the range of non-market services provided by well-managed agricultural land (i.e. those outside of food production and sales) could be valued economically, and the extent to which food production must respect environmental limits be carefully considered. These two issues require thorough analysis, and provide Defra with an opportunity to make significant progress on improving the quality and productivity of our natural environment.

In *Setting the Table: Advice to Government on priority elements of sustainable diets* (2009),<sup>12</sup> the SDC identified three priority areas through which Government can make the biggest contribution to improving health and reducing the environmental impacts of the food system: reducing meat and dairy consumption; reducing consumption of food and drink of low nutritional value; and reducing food waste. We also identified three further areas that could improve the sustainability of the diet: increasing consumption of seasonal, field grown fruit and vegetables; consuming fish only from sustainable stocks and increasing consumption of foods that have been produced organically.

The SDC is encouraged by Defra's research on consumer attitudes and behaviours to sustainable food. We would further encourage the Government to investigate and review the issues raised over meat and dairy consumption. As evidence is emerging, we consider that space for such public dialogue is opening up. For example, work recently undertaken by the Food Ethics Council and WWF-UK demonstrates that there is consensus that in general, it is appropriate for the UK Government to seek to reduce GHG emissions relating to what we consume.<sup>13</sup>

*Sustainable Development: The key to tackling health inequalities* (2010)<sup>14</sup> sets out the following food policy recommendations for government, which together address a range of procurement, land use

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<sup>12</sup> SDC 2009. *Setting the table: Advice to Government on priority elements of sustainable diets*. [http://www.sd-commission.org.uk/publications/downloads/Setting\\_the\\_Table.pdf](http://www.sd-commission.org.uk/publications/downloads/Setting_the_Table.pdf)

<sup>13</sup> MacMillan, T. and Durrant, R., (2009) *Livestock consumption and climate change: A framework for dialogue*, <http://www.foodethicscouncil.org/files/Livestockconsumption.pdf?PHPSESSID=2f2701d105c5ee9c5ab93108f7bd8b25>

<sup>14</sup> SDC 2010. *Sustainable Development: The key to tackling health inequalities*. [http://www.sd-commission.org.uk/publications/downloads/health\\_inequalities.pdf](http://www.sd-commission.org.uk/publications/downloads/health_inequalities.pdf)

and education issues. By working across government to drive and embed these issues, Defra can reduce the pressure on our natural environment, and improve the way in which we use it sustainably:

- Priority must be given to reducing greenhouse gas emissions from the food and agriculture sector, with an emphasis on the need for a reduction in the consumption of animal source foods
- New fiscal policies are required to improve affordability of healthy and sustainable food choices. The cost of ensuring a nutritious and sustainable diet should be reflected in setting minimum wage and benefit levels
- Policy should be informed by successful public sector food procurement programmes as mechanisms to 'choice edit' out less healthy/sustainable foods and encourage access to more nutritious and sustainable foods through schools, hospitals, social care and prisons
- Indices should be developed to show geographic variations in price and availability of healthy food and health outcomes, and these data sources used to develop remedial strategies including encouraging community-led responses, as with the Sandwell Food Access Project
- Work needs to be carried out to understand fully the economic, environmental and social benefits of existing sustainable food projects (such as market gardens, allotments, gardeners' clubs, community growing schemes etc) to guide policy development in future.





**Sustainable**  
Development Commission

**The Sustainable Development Commission is the Government's independent watchdog on sustainable development, reporting to the Prime Minister, the First Ministers of Scotland and Wales and the First Minister and Deputy First Minister of Northern Ireland.**

**Through advocacy, advice and appraisal, we help put sustainable development at the heart of Government policy.**

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